

**UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW HAMPSHIRE**

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* **United States of America** *
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* *
* **v.** *
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* *
* **Ian Freeman** *
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ASSENTED TO MOTION FOR RETURN OF PARTIAL BAIL

NOW COMES the defendant, Ian Freeman, by and through counsel, Mark L. Sisti, Esq. and respectfully moves this Honorable Court to Return Partial Bail in the above-captioned matter.

As grounds for this request it is stated:

1. Bail in the amount of \$200,000.00 was posted by Sisti Law Offices.
2. On or about December 22, 2022, the defendant was convicted of eight (8) charges.
3. The defendant was sentenced by this Court on or about October 2, 2023.
4. The defendant is requesting that \$150,000.00 of the bail, which represents third party surety money, be released, and made payable to Sisti Law Offices.
5. The remaining \$50,000.00 would remain with the Court pending further pleadings by the parties.
6. This office has contacted John Kennedy, Assistant US Attorney, and he indicated that the US Attorney's Office assents to this request.

Respectfully Submitted,

Dated: November 6, 2023

/s/ Mark L. Sisti, Esq.
Mark L. Sisti, Esq.
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/s/ Richard Guerriero, Esq.
Richard Guerriero, Esq.
N.H. Bar ID. 10530
Law Clerk: Oliver Bloom
Lothstein Guerriero, PLLC
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(603) 352-5000
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CERTIFICATION

I hereby certify that on this 6th day of November 2023 that a copy of the foregoing Assented to Motion for Return of Partial Bail has been forwarded to Seth Aframe, Esq., Georgiana MacDonald, Esq and John Kennedy, Esq., of the U.S. District Attorney's Office, through the Court's electronic filing system.

/s/ Mark L. Sisti, Esq.
Mark L. Sisti, Esq.